

COUNTY/DISTRICT COURT, BOULDER COUNTY, COLORADO

Criminal Action Number D0072019CR000185-4

## WARRANT FOR ARREST UPON AFFIDAVIT

BEFORE THE HONORABLE Thomas F. McWhill

The People of the State of Colorado,  
To: Any person authorized by law to execute arrest warrants.

You are hereby commanded to arrest the person of:

**William L. Karelis**

DOB:	08/21/1947	HAIR:	Gray
HEIGHT:	6'01"	EYES:	Brown
WEIGHT:	203	RACE/SEX:	White/Male
DL #:	[REDACTED]	SSN:	[REDACTED]
ALIAS:		ALIAS D.O.B.:	

OFFENSE DATE: September 8, 2000

And take the person above-named without unnecessary delay before the nearest judge of the Court of Record; to be advised that the person is being held for the alleged commission of the following crime(s), to-wit: In violation of C.R.S., 1973 revised:

Charge #	CRS #	Charge	Classification
1	18-3-405.3(2)(b)	Sexual assault on a child by one in a position of trust as a pattern of sexual abuse	F3

That this warrant for arrest is issued upon affidavit sworn to and affirmed before this court and relating facts sufficient to establish probable cause that the above-named offense has been committed and probable cause that the person named in this warrant committed that offense.

BAIL IS SET AT \$ No Bond WITH CONDITION(S) until seen by judicial officer

DATE: 1/30/19

T. [Signature]  
Judge's Signature

Boulder Police Case # P18-10451

Detective Ross Richart 303-441-1833

### RETURN OF SERVICE

I hereby certify that I have duly executed this warrant on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,  
by \_\_\_\_\_ as I am herein commanded.

#### SHERIFF FEES:

Service \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_  
Return \$ \_\_\_\_\_  
Total \$ \_\_\_\_\_

By: \_\_\_\_\_  
Deputy

## AFFIDAVIT FOR ARREST WARRANT

The Affiant (hereafter referred to as "I"), Detective Ross Richart, is a duly commissioned Police Officer for the City of Boulder, located in the County of Boulder, State of Colorado, being duly sworn, deposes and states:

I am currently assigned to the Detective Section of the Boulder Police Department and investigate crimes occurring within the City of Boulder, County of Boulder, State of Colorado.

On August 17, 2018, Boulder Police Officer Shane Rodgers was dispatched to contact [REDACTED] over the telephone. Ofc. Rodgers called [REDACTED] who reported that a friend of hers said that she had been sexually assaulted by a male when she was a child. [REDACTED] identified her friend as [REDACTED] [REDACTED] identified the male as Bill (William) Karelis (DOB 08/21/1947). [REDACTED] told Ofc. Rodgers that Bill Karelis is former member of the Shambhala Buddhist Community where he was a meditation teacher and instructor. [REDACTED] told Ofc. Rodgers that [REDACTED] reported that the sexual assaults occurred between the ages of 9 and 13.

[REDACTED] provided a statement by email to Ofc. Rodgers. In the email she stated that [REDACTED] disclosed the sexual assault to her on August 14, 2018. [REDACTED] told [REDACTED] that the sexual assaults happened at the home of Bill Karelis in Boulder. [REDACTED] told her that the sexual assaults happened when Bill's wife was home. [REDACTED] would go to bed in a separate bedroom. Bill would wait until his wife was asleep, then he would come down to her bedroom where he would sexually assault her.

On September 26, 2018, I met with [REDACTED] at the Boulder Police Department for an interview. She told me the following:

[REDACTED] grew up in Denver and she grew up in the Shambhala community. Her mother was and still is a very prevalent member in the community. Boulder is the heartbeat of the Shambhala community and she spent a lot of her time with her family in Boulder amongst the other members of the Shambhala community. In Shambhala, when you turn 8 years old, there is an event called a rites of passage ceremony. This is a coming of age ceremony where you can decide if you want to participate in Shambhala activities or not. This ceremony is a big deal/big event when you are growing up. It's a series of events every Saturday for around six weeks in which you participate in activities which are ritual, or meditation oriented with the Shambhala lineage. It's at this time when you are assigned a meditation instructor. This person is meant to help you with getting through the six-week activities and they are also your main teacher if you decide that you do want to continue with the meditation associated with Shambhala.

Around 1995, when [REDACTED] was eight years old, Bill (William Karelis) was assigned as her meditation instructor. At this point Bill was a very prevalent teacher in that (Shambhala) community. She felt very lucky to have Bill as her instructor and everyone else was telling her



how lucky she was to have Bill as her instructor. Her perception as a young kid was that she got the best instructor and she was very excited about this. At this point her interaction with Bill was somewhat limited compared to the amount of time that she would spend with him when she was a few years older. Her interactions with Bill consisted of a lot of one on one meditation interviews during her meetings. These meetings could last from 60-90 minutes and she was alone with him during those meetings. Also, because he was such a prevalent person in the Shambhala community, she would regularly see him at other Shambhala events. [REDACTED] didn't feel the "creepies" from Bill for the first several years that she knew him. Looking back on those events, she felt like there was grooming and manipulation occurring in which he was building himself up to be a very powerful person.

At many of these public Shambhala events, Bill would want her with him. She described this as feeling like she was Bill's little "show dog." She felt like Bill wanted people to associate them together. Her parents really encouraged her interactions with Bill, she felt like they looked at it as a good thing to have such a reputable man taking her under his wing.

Around the year 2000 [REDACTED] started high school. She started taking to the Shambhala teachings more and she wanted somebody to be actively engaging with her. Around this time was when she became very close with Bill and when things really started to escalate. When she was a "kid" she remembered some erections and wet kisses from Bill, but things didn't escalate physically until around age 11 or 12.

Around this time, [REDACTED] had goals of dharma programs she wanted to attend, and of different retreats and levels that she wanted to go through within the Shambhala organization. This was partly because of what Bill wanted her to do and what she thought the community wanted her to do. In preparation to going to these different retreats and programs she started spending a lot more time with Bill so that she would be prepared. Her relationship with Bill started moving into more of the private sphere, outside of the typical student teacher relationship. Her parents were completely aware of this increased time being spent with Bill and they encouraged it. Her parents would regularly allow her to take a bus to Boulder to spend time with Bill. She would sometimes spend the weekend with Bill at his house in Boulder. The Shambhala community, including her parents, completely trusted and respected Bill. Most of her memories of sexual abuse come from being at Bill's house during those overnight periods.

Bill told [REDACTED] that his wife had a designated bed time when she came over to the house. It was not uncommon for the three of them to go out to dinner before coming back to the house to watch a movie together on the couch. Bill would be watching the clock while they watched the movie together, watching the time in preparation for he and his wife going to bed. [REDACTED] would then go to her designated bedroom and wait for Bill to come down to meet her in her bedroom.

All the sexual experiences with Bill happened at his house in Boulder when she was 11 or 12 years old (early 2000's). She remembered that he lived in a two-story house and that his



bedroom was upstairs and the bedroom she slept in was downstairs. She mainly remembered taking the bus to Boulder. She didn't remember her parents driving her to Bill's house. She didn't remember Bill ever coming to her house to pick her up. She didn't specifically remember, but she thought that Bill probably picked her up at the bus station and brought her to his house.

The bed that she slept in at Bill's house had a rod iron frame. She remembered white translucent curtains and a ceiling fan being in her room. The room was moderately sized room about the same size as the interview room in which we were speaking. She remembered the house being a very moderate type of home with approximately three bedrooms. The floors in the main part of the home were hardwood, she couldn't specifically remember if the floor in her bedroom had hardwood floors. There was a fireplace and a television in the main room where they would watch movies. She spent a lot of time laying in her bedroom looking at the ceiling waiting for Bill to come down to her.

Bill would not do anything sexual with [REDACTED] when his wife was present. The typical routine was that they would watch a movie together. Bill and his wife would then go to their bedroom upstairs and [REDACTED] would go to her room on the first floor. [REDACTED] would wait in her bedroom for Bill to come down to her bed.

[REDACTED] couldn't specifically remember how old she was the first time she spent the night at Bill's house. She also couldn't remember how many times she spent the night at his house. She said that sexual things didn't happen the first time she went to his house and they didn't happen every time that she went to his house. [REDACTED] described the events at Bill's house as all being blurred together in her mind.

[REDACTED] said it was very difficult for her to sort her memories into a chronological order concerning the sexual encounters with Bill at his house. She did remember the first time when she felt like something was inappropriate. She remembered that he dropped her off somewhere in his car and before she got out, he kissed her for what she felt like was "too long." She did not feel like it was an inappropriate thing for a man to kiss her on the lips as a child. She felt like that was something that they just did in the Shambhala community. She never saw an adult kiss a child, but she saw adults in the community kiss each on the lips often. But, with Bill, the kisses just kept getting longer and longer.

Overnights at Bills house started around 11-12 years old, around the year 2000. [REDACTED] remembers being around 13 years old when Bill first performed oral sex on her at his house in the bedroom that she slept in. Bill never used his fingers or his penis, he only performed oral sex on her. Bill never asked her to perform oral sex on him. The oral sex only happened at his house in the bedroom that she slept in. [REDACTED] never saw Bill's penis, but he would push his erect penis against her body. Bill told her often how much he loved her. He seemed very concerned about [REDACTED] cleaning herself up after he performed oral sex on her. She described it as seeming very abrupt; he would start, then it would finish, and he would leave. At the beginning, the



sexual touching was very affectionate. She noticed that the longer they were together the more she started to feel ashamed. She remembered one situation when they were at a center and he threw a box of tissues at her and told her to clean herself up before she came out. It seemed like a ritual to him; once he was done performing the act then he was done with her.

██████ didn't know what ejaculating was at the time and she didn't remember that happening. She said that Bill made it very much about her when he was performing oral sex.

██████ couldn't remember the frequency of her overnight visits with Bill. She didn't remember it being on a set or prearranged schedule. ██████ thought it was when Bill wanted to see her was when she would come up to his house and spend the night. ██████ remembered speaking with Bill over the phone and coordinating things with her parents.

██████ estimated that Bill performed oral sex on her ten times over approximately a year and a half period. There were times when Bill would come into her room and only kiss her and not progress to oral sex. There were other times when Bill wouldn't come down to her room at all. ██████ remembered waiting for him in her bed and feeling afraid.

During the sexual events at Bill's house, the lights were always off in the room. She remembered the curtains in the room and a lot of the light coming in through the curtains in the room. She also remembered all the windows being on one wall. Bill never parked his vehicle in the garage at his house. He would park in the street next to the curb and they would walk up to the house together. She described the exterior of the house as being very nice. There were lawn ornaments in the yard to include small statues of Buddha. There was a flagstone or brick walkway that led to the house. She couldn't remember for sure if it was flagstone or brick, but she knew that it was not a normal type of sidewalk. She remembered smelling pine around the house.

██████ described her relationship with Bill as changing over time. At first it felt like she was mandated to spend time with Bill. She felt like her mother really wanted her to spend time with Bill. ██████ felt like things were very scheduled with Bill when she first started seeing him. She felt very paraded around by him for about the first three years that she knew him. Then something seemed to change, and it felt like he started demanding more time with her. Their sessions went from 40 minutes, to 60 minutes, to 90 minutes. She felt like it was expected that if Bill came to an event in Denver then she was expected to be there with him. It progressed to moving away from the community dictated relationship into something much more personal.

Physically, it felt like a very gradual progression. Things didn't immediately become physical when she would spend the night at his house. The first several times Bill would just come down to her room and they would talk. She came to expect him to come down to her room after she had gone to bed. Bill was very masterful at saying "here is the boundary let's just push it an inch, because if it's just an inch it is not a big deal".



Her meetings with Bill never felt wrong to her, so there was never a moment where she felt like he was crossing the line. [REDACTED] said that it felt very organic. She was never completely naked, and he would never come into her room and tell her to take off her clothes. He was never naked while he was with her. Bill would have erections and he would press them against her, but he never exposed his penis to her. She felt like it was all about him loving her. She didn't feel like there was a progression regarding the sexual touching, but she remembered just feeling very lucky. At that time, [REDACTED] felt very special; she felt like she was better than his wife.

Bill never had vaginal sex with her, she said "he never raped me." [REDACTED] said that Bill performed oral sex on her at his house on several different occasions.

She didn't remember Bill ever telling her to keep things a secret, but a key component of Shambhala are the secrets that you receive about teachings because you are at a certain level. It felt like they had progressed into this secret space. She felt like people wouldn't understand their love, so she shouldn't talk about it. [REDACTED] felt like she was special and better than everybody. Bill would often ask [REDACTED] about boys at her school and her relationships with them. He would also ask her about dances and other school events. [REDACTED] didn't have any other boys other than Bill and that was the way that she wanted it.

[REDACTED] described her relationship with Bill as being like a show dog, in which Bill would hold her hand and pull him along with her while they were at big events. She felt very owned by Bill and she was very proud of this. She remembered at a very young age that Bill would smell her when he was hugging her. She knew that he was smelling her because she could hear him breathing into her ear as he was hugging her. [REDACTED] described Bill as being very strategic and careful with her.

Bill regularly gave lectures in Denver at the Denver Shambhala center. Whenever this would happen, it was mandatory that she would show up to these lectures. One of her memories of abuse happened at one of these lectures in Denver. She couldn't remember the exact circumstances of the event but what she did remember was that she and Bill were in one of the offices at the Shambhala Center in Denver. After their session, she stood up and Bill gave her a very long kiss and hugged her for an extended period. While he was hugging and kissing her, she felt Bill's erect penis pushed against her. This was the first time that she was certain that he had an erect penis. [REDACTED] estimated that she was older when this happened (approximately 16), but she wasn't certain where this event fit in with the other events.

Sometime around December of 2003, her mother came into her bedroom and asked her "what's up with you and Bill Karelis?" She told her mom that Bill was up at the Shambhala mountain center conducting a retreat. Her mom then explained to her that the program he was teaching was to teach other people how to become meditation instructors. At the end of the program the students take a vow to become a teacher. Part of that vow as a teacher is that if you feel any sexual attraction towards a student or a potential student then you cannot be their teacher. There



is a very strict boundary around this area of being a Shambhala teacher. When they were explaining this vow to the students, several women in the crowd stood up and accused Bill Karelis of inappropriate sexual behavior. This was the first time (to ██████ knowledge) that Bill's behavior was made public and that others within the community started talking about his inappropriate sexual behaviors.

When this information came out about Bill, ██████ didn't know of any other children that Bill was instructing other than herself. ██████ denied everything to her family regarding any sexually inappropriate behavior involving Bill. Her mother arranged for her to go to counseling once she found out about Bill's inappropriate behavior with others. At that counseling she told the counselor about the surface level kisses, the erections, and the groping that Bill had done with her. The counselor told her that she was mandated to report that by Colorado State law. In the years since, ██████ said that she has used that as an excuse for not reporting. This counselor was in Denver and ██████ didn't hear anything else about this after she reported it to the counselor.

It was a big deal in the Shambhala community that Bill had been exposed. Bill was expelled from the community and they set up a council of people that were responsible for keeping in contact with him as well as working with people in the community to heal the wounds from this event.

In the summer of 2004 she participated in another Shambhala retreat/program. At this program, the president of Shambhala International, Richard Rioch, pulled her aside and wanted to have private interviews with her specifically about Bill. She didn't remember much about these interviews other than feeling very worried for Bill.

The most challenging thing for ██████ when Bill was expelled by Boulder Shambhala, was her relationship with Bill's wife. His wife was still a very active member in the community. On one occasion, she approached ██████ and cornered her in a public area at a retreat center. Bill's wife was very upset, and she told ██████ that she really needed to talk to her, and she needed to know what was going on with her and Bill. She told ██████ that Bill missed her very much. ██████ didn't respond to her, instead she turned around and walked away from her.

I met with ██████ mother, ██████ on several different occasions. ██████ told me that Bill Karelis lives at 522 Arapahoe Ave and that he has lived at this address since she has known him. ██████ informed me that Bill Karelis was living at 522 Arapahoe Ave. during the time that he was meeting with ██████ as her meditation instructor. ██████ told me that this was the location where ██████ spent the night with Bill and his wife on several different occasions.

I completed an online search utilizing the Boulder County website under the section assessor's office. A property search of 522 Arapahoe Ave. showed that owner of this address is William L. Karelis.

William Karelis obtained an attorney and I was advised by the attorney not to contact William Karelis. William Karelis has not been interviewed or provided any statements related to this investigation.

I believe that sufficient probable cause exists to believe that **William L. Karelis** with a date of birth of **08/21/1947**, described as a white male, 6'01" tall, 203 pounds, with gray hair and brown eyes, committed the crime of **Sexual assault on a child by a one in a position of trust as a pattern of sexual abuse** as outlined in **C.R.S 18-3-405.3(2)(b)**.

I respectfully request that a warrant be issued for **William L. Karelis**, with a date of birth of **08/21/1947** and is further described as a **White Male** who is **6'01"** tall, **203** pounds with **gray** hair and **brown** eyes committed the crime of **Sexual assault on a child by one in a position of trust as a pattern of sexual abuse** as outlined in **C.R.S 18-3-405.3(2)(b)** a class 3 felony..

Rea Richard 6779

Affiant

Sworn to before me and subscribed in my presence this 30 day of January, 2019  
in the City of Boulder, County of Boulder, and the State of Colorado.

T

Judge

My commission expires: